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June 15, 2015

Judge Paul A. Crotty, U.S.D.J. United States District Court Southern District of New York 500 Pearl Street, Chambers 1350 New York, NY 10007

Re: Donoghue v. Achillion Pharmaceuticals, Inc., No. 1:14-cv-8353-PAC (S.D.N.Y.)

Dear Judge Crotty,

I write on behalf of all Parties in the above-referenced matter, and in accordance with Local Civil Rule 7.1(d) and the Court's Individual Rule 1(E), to request a one-week extension of the Parties' deadline to submit the necessary paperwork regarding the settlement reported during the June 3, 2015 Interim Pretrial Conference. The date on which the Parties are currently due to submit the settlement paperwork is June 17, 2015 (Dkt. 52). This is the Parties' first request to extend that deadline.

During the June 3, 2015 Interim Pretrial Conference, the Parties informed the Court that they had reached agreement on terms to settle the Section 16(b) claims against the RA Capital defendants and Blackwell. The Parties have made significant progress toward completing a stipulation of settlement (the "Stipulation") and proposed order and final judgment approving the settlement (the "Proposed Order"), but need more time to

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finalize those documents. Counsel for all Parties have conferred and seek to bring a joint motion to extend the deadline to submit the Stipulation and Proposed Order until June 24, 2015. The request does not affect any other scheduled dates.

Respectfully submitted,

By: \_\_\_\_/s/ Derek Musa

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of June 2015, I served the foregoing document upon all registered counsel in the case via the Court's CM/ECF system by filing the document electronically with the Clerk of Court.

New York, New York	
	/s/ Derek Musa
	Derek Musa